

1:18mj2117

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

COMPLAINT AFFIDAVIT

I, David Gardner, a Special Agent with the Federal Bureau of Investigation (FBI),
(hereinafter Affiant) being duly sworn, deposes and states:

1. Affiant is a Special Agent of the FBI, and, as such, is an investigative or law enforcement officer of the United States within the meaning of Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure. Affiant is engaged in the enforcement of criminal laws and is within a category of officers authorized by the Attorney General to request criminal complaints and execute arrest warrants pursuant to Title 18, U.S.C., Section 3052 and 3107; and Department of Justice (DOJ) regulations set forth at Title 28, C.F.R., Sections 0.85 and 60.2(a). This authority includes the authority to request and execute criminal complaints and arrest warrants pursuant to Rule 41 of the Federal rules of Criminal Procedure.

2. Affiant has been a Special Agent with the FBI for 19 years in Greensboro, North Carolina, Budapest, Hungary, and Cleveland, Ohio, and has received specialized training and experience in the investigation of drug trafficking, organized crime and financial crimes in violation of federal law. Affiant has conducted investigations which led to successful prosecutions for violations of federal drug and firearms laws, extortion, bank robbery, mail fraud, wire fraud, bank fraud, securities fraud, and money laundering, as well as other violations of federal law. Affiant has bachelor's and master's degrees in accounting and business administration and worked in those fields for five years before becoming an FBI agent.

3. Affiant is the case agent on this investigation and, as such, is fully familiar with the facts of the case, either as the result of direct personal participation in the investigation, or

from verbal or written reports provided to me by other FBI agents or law enforcement officers who have participated in the investigation. In that regard, unless otherwise noted, wherever in this Affidavit Affiant asserts that a statement was made, the information was provided to Affiant by another FBI agent, law enforcement officer, or witness who may have had either direct or hearsay knowledge of that statement and to whom Affiant or others have spoken or whose reports Affiant has read and reviewed. Such statements are set forth in this Affidavit in substance or in pertinent part unless otherwise indicated. Furthermore, since this Affidavit is being submitted for the limited purpose of securing a criminal complaint, Affiant has not included the details of every aspect of the investigation. In so doing, Affiant notes that facts not set forth herein are not being relied on by Affiant in connection with this criminal complaint request.

SUBJECT

4. MAJA VRACAR, female, 5'6" tall, 136 pounds, black hair, brown eyes, born on June 23, 1989, Social Security Account Number XXX-XX-6721, currently resides at 3330 Norris Avenue, Parma, Ohio, previously resided at the Residences at Hanna, 1401 Prospect Avenue, Apartment 803, Cleveland, Ohio.

5. Affiant submits there is probable cause to believe that, from approximately July 2017, through the January 23, 2018, in the Northern District of Ohio (NDOH), MAJA VRACAR, and others, possessed with intent to distribute marijuana and conspired to distribute marijuana in violation of Title 21 U.S.C., Sections 841 and 846, and/or unlawfully used a communication facility in violation of Title 21, U.S.C., Section 843 (hereinafter the "Target Offenses"). Affiant hereby requests the issuance of arrest warrant for MAJA VRACAR.

PROBABLE CAUSE

BACKGROUND OF INVESTIGATION

6. Since at least September 2015, the FBI has been investigating the Amer Jabir Drug Trafficking Organization (DTO) consisting in mostly ethnic Palestinians operating until January 23, 2018, in Cleveland, Ohio, Detroit, Michigan, Chicago, Illinois, and California. The Amer Jabir DTO is led by Amer Jabir and trafficked in marijuana and hashish. At least three members of the Amer Jabir DTO who were involved in trafficking in marijuana, Ahmad Jabir, Aymen Abdelrahim, and others were also involved in the trafficking of illegally obtained controlled narcotics. Affiant submits there is probable cause to believe that MAJA VRACAR is the girlfriend of Aymen Abdelrahim, resided with him at 1401 Prospect Avenue, Apartment 803, Cleveland, Ohio, assisted him with narcotics trafficking, and unlawfully utilized communication facilities in furtherance of narcotics trafficking. On January 23, 2018, based upon a criminal complaint filed in the United States District Court for the NDOH and signed by the Honorable United States Magistrate Judge David A. Ruiz the previous day, Amer Jabir, Ahmad Jabir, and Abdelrahim were arrested. On February 13, 2018, Amer Jabir, Ahmad Jabir, Abdelrahim and another individual were indicted in the United States District Court for the NDOH for the Target Offenses. On March 14, 2018, a superseding indictment was filed in the United States District Court for the NDOH against Amer Jabir, Ahmad Jabir, Abdelrahim and six others for violations of the Target Offenses.

7. Beginning in September 2015, and continuing to the present, Confidential Source (CS) 1, hereinafter referred to as CS-1¹, provided information regarding the drug trafficking

¹ CS-1 has been opened as a CS for the FBI since September 2015 in Cleveland, Ohio. CS-1 is cooperating with

activities of several members of the group. Specifically, in September 2015, CS-1 advised that an individual known as "O", also known as "Omar," and later identified as Amer Jabir, and "Nickname 1," later identified as Co-Conspirator 1, are high level members of the organization. CS-1 further advised that the DTO operates marijuana grows in California and that marijuana is transported from California to Chicago and finally to Cleveland, Ohio. CS-1 reported the marijuana is transported in trapped out vehicles which are placed on the back of car haulers. CS-1 further reported that the organization receives 600 pounds of marijuana which it distributes every two weeks. CS-1 advised that CS-1 was being told the information by a Co-Conspirator who was a target of the investigation at the time but was later recruited as a CS, hereinafter referred to as CS-2².

8. In September 2015, CS-1 reported that CS-2 was being supplied by Amer Jabir and Co-Conspirator 1. CS-1 further reported that CS-2 traffics in pounds of marijuana per month and that CS-2 was purchasing the marijuana from Amer Jabir for \$3,600 per pound. CS-2 estimated to CS-1 that Amer Jabir was purchasing the marijuana for \$1,800 - \$2,500 per pound and that Amer Jabir was significantly profiting through CS-2's drug sales.

9. During the course of the investigation from September 2015 through March 2017, CS-1 conducted numerous consensually recorded conversations with CS-2 documenting the

the United States Government in order to receive consideration for potential drug trafficking charges which have not yet been filed. CS-1 has provided significant information to the FBI regarding the activities of the group described in this affidavit. CS1 has also conducted three controlled purchases in this matter. CS1's information concerning the group described in this affidavit has been corroborated by the investigation conducted to date, surveillance, consensual recordings by CS1, and by records searches and telephone records analysis conducted by Affiant and other law enforcement agents/officers/analysts. CS1's information has never been found to be false or misleading. For these reasons, Affiant considers CS1's information to be reliable.

2 CS-2 was recruited as a CS in early 2017. Therefore, any references to CS-2 prior to early 2017 occurred prior to CS-2's cooperation. Details in reference to the reliability of CS-2 are set forth in footnote 4.

information provided by CS-1. Affiant and other agents have listened to the consensually recorded conversations and determined that they corroborate CS-1's version of events.

10. On September 23, 2015, CS-1 conducted a controlled purchase of two ounces of marijuana from CS-2³.

11. On June 16, 2016, prior to CS-2 being recruited as a CS, CS-1 reported that Amer Jabir was going to meet with CS-2 in the next 40 minutes. Surveillance conducted by FBI agents at CS-2's residence on June 16, 2016 identified a male matching Amer Jabir's appearance and driving a vehicle registered to an individual with the last name of "Jabir" stop by CS-2's prior residence for a brief period of time. On June 20, 2016, CS-1 reported that Amer Jabir supplied CS-2 with a large quantity of marijuana. Also on June 20, 2016, CS-1 identified Amer Jabir's telephone number as 773-630-2582. This telephone number will hereinafter be referred to as Prior Telephone 1 (PT1).

12. In early 2017, a state search warrant for violation of Ohio marijuana trafficking laws was executed at the Cleveland area residence of CS-2⁴. Prior to the execution of the search

3 A controlled purchase consists of agents directing a confidential source of information to arrange a drug purchase from a known target. Thereafter, if the source is successful, agents first meet with the source and search the source and his/her vehicle to assure that no contraband is in the source's possession and to inventory the source's money. The purchase/transaction/delivery in which the source would be involved is recorded using secreted audio and/or audio/video recorders and source is provided the funds necessary to purchase the illegal drugs. Subsequent to any purchase/transaction/delivery the source and his/her vehicle are again searched for the presence of contraband, the source's funds are again inventoried, all evidence/recordings obtained are seized, the source is debriefed, and any recordings are reviewed by agents.

4 CS-2 has been opened as a CS for the FBI since March 8, 2017 in Cleveland, Ohio. CS-2 is cooperating with the United States Government in order to receive consideration for potential drug trafficking charges which have not yet been filed. CS-2 has provided significant information to FBI Cleveland regarding the activities of the group described in this affidavit. CS-2's information concerning the group described in this affidavit has been corroborated by the investigation conducted to date, surveillance, consensual recordings by CS-2, and by records searches and telephone records analysis conducted by Affiant and other law enforcement agents/officers/analysts. CS-2's information is not believed to be false or misleading. For these reasons, Affiant considers CS-2's information to be reliable.

warrant, trash pulls were conducted at the residence and a top of a vacuum sealed bag which tested positive for marijuana and marijuana cigarettes were located among other items.

Furthermore, CS-1 had identified that CS-2 had marijuana at CS-2's residence. During the execution of the search warrant, several pounds of marijuana and other drug related items such as scales and a vacuum sealer were located. During the execution of the search warrant, CS-2 agreed to cooperate with the FBI.

13. Beginning with CS-2's cooperation, from early 2017 to the present, CS-2 provided the following historical information set forth in this paragraph through paragraph 17. CS-2 identified that Amer Jabir is from Chicago and that he and other members of his group are transporting large quantities of marijuana from California to Chicago. CS-2 identified that Amer Jabir has an apartment in downtown Chicago and an apartment in downtown Cleveland. A portion of the marijuana is distributed in Chicago and the remaining supply of marijuana is transported to Cleveland and Detroit, Michigan where it is distributed to Amer Jabir's customers. CS-2 estimated that Amer Jabir brings up to 200 pounds of marijuana at a time to the Cleveland, Ohio area. CS-2 was shown an Ohio Bureau of Motor Vehicles photograph of Amer Jabir which (s)he identified as "O" or "Omar."

14. Following CS-2's early 2017 initiation of cooperation, CS-2 further advised that Aymen Abdelrahim, is a dealer for the organization. Also, CS-2 stated that Amer Jabir's younger brother, Ahmad Jabir is also a dealer and delivery guy for the organization. CS-2 was shown an Ohio Bureau of Motor Vehicles photograph of Ahmad Jabir which (s)he identified as "Stank" or "Biggs," the little brother of Amer Jabir. CS-2 was shown an Ohio Bureau of Motor Vehicles photograph of Abdelrahim which (s)he identified as "Heime," a cousin of Amer Jabir

and Ahmad Jabir.

15. Following CS-2's early 2017 initiation of cooperation, CS-2 identified that Co-Conspirator 2 was a "money man" for the organization. CS-2 identified that Co-Conspirator 4 was a large-scale trafficker in marijuana and one of Amer Jabir's customers on the east-side of Cleveland, Ohio⁵. CS-2 identified photographs of Co-Conspirator 2 and Co-Conspirator 4 as the individuals (s)he knows as Co-Conspirator 2 and Co-Conspirator 4.

16. Following CS-2's early 2017 initiation of cooperation, Affiant reviewed the pen register records and cell site information for PT1⁶ from June 23, 2016 to August 21, 2016 in order to corroborate the information provided by CS-1 and CS-2. As set forth in paragraph 11, CS-1 previously reported that PT1 was being utilized by Amer Jabir. A review of the records identifies over three hundred telephone calls between PT1 and a telephone number CS-1 previously identified as being used by Co-Conspirator 2 and over one hundred calls between PT1 and a telephone number CS-1 previously identified as being used by CS-2. A review of the cell site location information for PT1 identified that PT1 was using cellular telephone towers in the Cleveland, Ohio and Chicago, Illinois areas, as well as in the Humboldt County, California area. Affiant knows Humboldt County, California to be a significant location for illegal marijuana grows operated in California.

17. Following CS-2's early 2017 initiation of cooperation, CS-2 advised that for over one year (from approximately mid-2015 through early 2017), CS-2 obtained marijuana from

⁵ The unidentified co-conspirators set forth herein are not identified in sequential order in order to be consistent with the criminal complaint filed in this investigation on January 22, 2018.

⁶ On June 23, 2016, the Honorable U.S. Magistrate Court Judge Kenneth S. McHargh, NDOH, signed an order authorizing the installation of a pen register device with cell site information for PT1.

Amer Jabir, Ahmad Jabir, or Aymen Abdelrahim which CS-2 resold to CS-2's customers. CS-2 identified Abdelrahim's telephone number as 440-XXX-3971, hereinafter referred to as **Target Telephone 1**.

CONTROLLED PURCHASES FROM AYMEN ABDELRAHIM

18. On August 15, 2017, CS-2 was met by Affiant and agents at a predetermined location. At 2:28 p.m., on August 15, 2017, CS-2 placed a consensually recorded phone call in the presence of Affiant/agents to Aymen Abdelrahim (AA) using 440-XXX-3971, **Target**

Telephone 1. Listed below is a transcript of the telephone call:

CS-2:	Yo, what up Heime?
AA:	Hello
CS-2:	Ya, what up?
AA:	What up?
CS-2:	It's (CS-2's name), asshole!
AA:	Oh, What up. . .?
CS-2:	What's good?
AA:	Chillin
CS-2:	Oh, I need just a little. Just like a zip (one ounce). You got some on you? (CS-2 is asking to purchase marijuana.)
AA:	Uhh, ya. Come see me at work at uhh, 3:30.
CS-2:	How much?
AA:	Two-twenty-five (\$225 for an ounce of marijuana)
CS-2:	Alright, Alright, I'll hit you up (I will call or text later).
AA:	Alright Man.

CS-2 advised that Abdelrahim is employed as a clerk at the Gas and Go, 3474 West 25th Street, Cleveland, Ohio. Subsequent investigation including surveillance and wire intercepts over **Target Telephone 1**⁷ have confirmed that Abdelrahim worked as a clerk at the Gas and Go

7 On September 20, 2017, the Honorable United States District Court Judge Donald C. Nugent, NDOH, entered an Order authorizing the interception of wire communications to and from cellular telephone 440-XXX-3971, **Target Telephone 1**, subscribed to by "A.A," known to be possessed and used by Aymen Abdelrahim. The wire interception of **Target Telephone 1** commenced on September 20, 2017 and terminated on October 19, 2017. Results of the wire interception of **Target Telephone 1** were sealed with the Court on October 20, 2017.

until his January 23, 2018 arrest. A review of court authorized pen register activity for **Target Telephone 1** corroborated that the phone call took place.

19. On August 15, 2017, CS-2 conducted a controlled purchase of approximately one ounce of marijuana from Abdelrahim at the Gas and Go. On that date, after adhering to all normal procedures for a controlled purchase as set forth above in footnote 3, CS-2 provided interviewing agents with a clear plastic bag with a green leafy substance suspected to be marijuana (hereinafter referred to as "purchased suspected marijuana" PSM1). PSM1 had a strong odor of marijuana and Affiant believes based upon Affiant's training and experience that PSM1 was in fact marijuana. PSM1 has been submitted to the Ohio Bureau of Criminal Investigations laboratory for testing but results have not yet been received.

20. Following the August 15, 2017 controlled purchase, CS-2 provided the following information which occurred during CS-2's meeting with Aymen Abdelrahim. Upon arriving at the Gas and Go, CS-2 spoke with Abdelrahim. Abdelrahim told CS-2 that he has some "Percs"⁸ coming pretty soon. Abdelrahim told CS-2 that he would let CS-2 know when they come in. After speaking with Abdelrahim for a period of time, CS-2 was instructed to retrieve an ounce of marijuana (PSM1) from the arm rest of Abdelrahim's vehicle. Abdelrahim claimed that another eighth of an ounce of marijuana was on the driver's seat of his car and Abdelrahim told CS-2 not to take it because he was selling it to someone else. CS-2 obtained the marijuana from Abdelrahim's Black Lincoln sedan as instructed and CS-2 observed the 1/8 of an ounce of marijuana in the car. CS-2 provided Abdelrahim with \$240 and Abdelrahim provided CS-2

⁸ CS-2 explained that Percocets is a generic or slang term used in order to refer to all types of Oxycodone Hydrochloride pills, to include but not be limited to, Oxycontin and Percocets.

with \$15 change. Agents reviewed the consensually recorded conversation and determined that it corroborated CS-2's version of events. Affiant has identified that Abdelrahim frequently traffics in narcotics from the Gas and Go through narcotics stored in his car in this same manner. For example, a pole camera aimed at the Gas and Go, from August 2017 through January 23, 2018, has identified numerous instances where individuals would enter the Gas and Go, likely to pay Abdelrahim for narcotics, and thereafter exit the Gas and Go and obtain something, likely drugs, from Abdelrahim's vehicle. Furthermore, wire intercepts over **Target Telephone 1** described herein below in paragraphs 32, 33, and 36, additional wire intercepts over **Target Telephone 1**, and a subsequent controlled purchase described in paragraphs 22 and 23 have confirmed this practice.

21. At approximately 4:30 p.m., on August 15, 2017, Affiant entered the Gas and Go and purchased a beverage from a clerk in the store. Based upon Affiant's review of Aymen Abdelrahim's Ohio driver's license photograph, Affiant believes that Affiant paid Abdelrahim, the clerk, for the beverage. Affiant did not observe any other persons in the Gas and Go at the time.

22. On August 23, 2017, CS-2 conducted a controlled purchase of 6 Oxycodone tablets (30 mg) and 1/2 ounce of marijuana from Aymen Abdelrahim at the Gas and Go. On that date, after adhering to all normal procedures for a controlled purchase as set forth in footnote 3 above, CS-2 provided interviewing agents with black bag containing 4 bags of marijuana totaling 18.5 grams [hereinafter referred to as "purchased suspected marijuana 2" (PSM2)] and a small, clear plastic bag bound with a rubber band containing 6 small blue pills suspected of being Oxycodone 30 milligram pills [hereinafter referred to as "purchased suspected controlled

narcotics 1" (PSCN1)]⁹. PSM2 had a strong odor of marijuana and Affiant believes based upon Affiant's training and experience that PSM2 was in fact marijuana. PSCN1 and PSM2 have been submitted to the Ohio Bureau of Criminal Investigations laboratory for testing but results have not yet been received.

23. On August 23, 2017, CS-2 provided the following information which occurred during CS-2's meeting with Aymen Abdelrahim at the Gas and Go on August 23, 2017. Upon arriving, CS-2 parked and entered the Gas and Go. Abdelrahim was working behind the counter. Abdelrahim told CS-2 to hurry up and "get the fuck out" and that the drugs were in the back seat of Abdelrahim's car, a black Lincoln. Abdelrahim instructed CS-2 not to touch anything else. CS-2 then counted out the \$320 and provided it to Abdelrahim and Abdelrahim provided CS-2 with \$5 change. CS-2 then went outside to the back seat of Abdelrahim's car and located a black bag in the backseat of the Lincoln containing PSM2 and PSCN1. After obtaining the narcotics, CS-2 entered the Gas and Go and obtained a Canada Dry. CS-2 told Abdelrahim that (s)he "got it" and Abdelrahim asked CS-2 if the store smelled (like marijuana.) CS-2 told Abdelrahim to "spray something." CS-2 then departed the Gas and Go. Agents reviewed the consensually recorded conversation and determined that it corroborated CS-2's version of events.

24. On September 25, 2017, CS-2 conducted a controlled purchase of approximately one pound of marijuana for \$3,200 from Aymen Abdelrahim at his residence, 1401 Prospect

⁹ Affiant identified that PSCN1 were small blue pills with a "30" on one side and a capital letter M inside of a square on the other side. A review of www.drugs.com identifies pills of this described appearance to be 30 milligram Oxycodone Hydrochloride pills supplied by Mallinckrodt Pharmaceuticals. Affiant knows Oxycodone to be a Schedule 2 controlled substance under the Controlled Substances Act.

Avenue, Apartment 803, Cleveland, Ohio. On that date, after adhering to all normal procedures for a controlled purchase as set forth in footnote 3 above, CS-2 provided interviewing agents with a blue plastic shopping bag containing approximately one pound of a green leafy substance omitting a strong odor of marijuana [hereinafter referred to as “purchased marijuana 3” (PM3)]. PM3 was submitted to the Ohio Bureau of Criminal Investigations laboratory for testing and found to be marijuana.

25. CS-2 provided the following information which occurred during CS-2’s meeting with Aymen Abdelrahim at his apartment (1401 Prospect Avenue, Apartment 803, Cleveland, Ohio) on September 25/26, 2017: Upon arriving, CS-2 parked and went upstairs to Abdelrahim’s apartment, #803. Abdelrahim was present with his friend, AT and Abdelrahim’s girlfriend, “Maja” was sleeping in the bedroom. CS-2 provided Abdelrahim with \$3,200 for one pound of the OG strand of marijuana. Abdelrahim and CS-2 counted the \$3,200. CS-2 did not see from where in the apartment the marijuana came. CS-2 told Abdelrahim that (s)he may need more marijuana. Abdelrahim told CS-2 that he is loaded with marijuana right now. Abdelrahim told CS-2 that he could get any amount of marijuana that CS-2 wanted. Agents reviewed the consensually recorded conversation and determined that it corroborated CS-2’s version of events. CS-2 was later shown an Ohio Department of Motor Vehicle photograph of MAJA VRACAR. CS-2 stated that CS-2 was not positive, but believed the individual depicted in the photograph was Abdelrahim’s girlfriend.

TARGET TELEPHONE 1 UTILIZED BY AYMEN ABDELRAHIM

26. On September 20, 2017, United States District Court Judge Donald C. Nugent, Northern District of Ohio (NDOH), entered an Order authorizing the interception of wire

communications to and from cellular telephone 440-XXX-3971, **Target Telephone 1**, subscribed to by “A.A,” known to be possessed and used by Aymen Abdelrahim. The wire interception of **Target Telephone 1** commenced on September 20, 2017 and terminated on October 19, 2017. Results of the wire interception of **Target Telephone 1** were sealed with the Court on October 20, 2017.

**INTERCEPTED CALLS, TEXTS CORROBORATING THE INFORMATION
PROVIDED BY CS-1 AND CS-2 REGARDING THE NARCOTICS
TRAFFICKING ACTIVITY OF AMER JABIR, AHMAD JABIR, AYMEN
ABDELRAHIM, AND MAJA VRACAR**

27. On September 21, 2017 at 11:50 p.m., Co-Conspirator 5 (C5), utilizing 440-XXX-0430¹⁰, placed a thirty-nine minute call to Aymen Abdelrahim (AA), using **Target Telephone 1**. During the phone call, Abdelrahim and Co-Conspirator 5 discussed narcotics trafficking and payments for narcotics trafficking regarding Ahmad Jabir, Amer Jabir, Co-Conspirator 2 and Co-Conspirator 4. In the transcript below and throughout this Affidavit, Affiant’s beliefs will be set forth in parenthesis. It should be noted that Abdelrahim, Amer Jabir, and Ahmad Jabir frequently spoke in both English and Arabic and portions of these transcripts have been translated by FBI translators. Listed below is a partial transcript of the call:

Co-Conspirator 5 and Abdelrahim are complaining about Ahmad Jabir:

AA: Like, I, he (Ahmad Jabir) telling me he gonna take my licks (drug deals) go ahead, nigger. Nobody stop me from getting money. He can take his five friends. I don't give a fuck. . . And then I

¹⁰ In May 2017, CS-2 identified Co-Conspirator 5’s telephone number as 440-XXX-0430. CS-2 has personally placed and received telephone calls to and from Co-Conspirator 5 on this number. Furthermore, in early, 2017, CS-2 provided consent to search CS-2’s phone and Affiant utilized a software system designed to document and analyze mobile devices. The search identified that a contact in CS-2’s phone listed as a nickname for Co-Conspirator 5 was associated with telephone number 440-XXX-0430.

gave him a pound (marijuana), right? to fucking hold, he asked me for a pound and he ain't give me my money for it (Ahmad Jabir never paid for the pound of marijuana).

C5: Ok. Why?

AA: Because remember that shit when he got, ah, when he went to jail and I ended up throwing some shit (marijuana) down the shoot. (Ahmad Jabir was arrested on April 29, 2017 in Middleburg Heights, Ohio for possession of approximately two pounds of marijuana. Ahmad Jabir was charged with possession of marijuana and trafficking in drugs.)

C5: Ok?

AA: And I told him I got him and he told me don't worry about it right now. I'm like, alright, you know, I got you though, I ain't gonna forget about you. He's like don't worry about it right now. When I need it, I'll haller at you (I will let you know. Abdelrahim is explaining that he owed a drug debt to Ahmad Jabir). I'm like, alright. So I text him, this was like a month ago, text him "what's up can I get that twenty-eight (\$2,800)?" (\$2800.00 is a common price per pound of high-grade marijuana) You know he had it for like a month already. And he's telling me, oh, you owe me six racks (rack is \$1,000), ah, this, this, that.

C5: Right. . .

Abdelrahim explaining to Co-Conspirator 5 that he is providing the marijuana to Co-Conspirator 5 almost at cost:

AA: I know. I know. Nigger but I ain't never do no dirty shit to you (Co-Conspirator 5) nigger. I, I risked my fucking -- cause I know, I knew what this shit was gonna end up happening, understand if O (Amer Jabir) finds out (that Abdelrahim was supplying Co-Conspirator 2 with marijuana obtained from Amer Jabir) he's gonna dog me thinking I'm cut throat him (going behind his back) but I told him. I was like nigger I was make [\$]50, then I started make a hundred dollars, and there was a couple times I gave it to you for the cost price, by God. The last two units which I got for twenty-three (\$2,300), I gave it to you for twenty-three (\$2,300). I never do this shit to make money nigger, you think I'm gonna do all that and play you, just so you could fuck with me (conduct narcotics trafficking with me) so I could make a hundred dollars, nigger? . . .

Abdelrahim discussing picking up funds for Amer Jabir and providing them to Co-Conspirator 2 and marijuana trafficking with Amer Jabir.

AA: When they were all out of town (in August 2017), Co-Conspirator

4 hooked up with me and gave me some money for O (Amer Jabir). And I gave that to Co-Conspirator 2 the next day. He (Ahmad Jabir) calls me, he got me salty too, he called me -- yo, you, you got that money? Like, nigger, what the fuck are you calling me about your brother's (Amer Jabir) money? You know what I'm saying? Like, Biggs (Ahmad Jabir) is calling me all day -- nigger I gave that shit to Co-Conspirator 2.

C5: Are you still fucking with O (Conducting narcotics trafficking with Amer Jabir)?

AA: I mean, I didn't grab none yet. I just gave him his money yesterday night (last night). (Abdelrahim paid Amer Jabir funds owed on a drug debt.)

Continuing

AA: By God, bro, cause I might not even fuck (conduct narcotics trafficking) with him (Amer Jabir) no more. I ran into so many niggers this month, I swear to Allah, they all telling me twenty-three (\$2,300 per pound), my nigger for cookie (strand of marijuana) and OG (strand of marijuana). Like, that's the price I pay for fruity shit (cheaper strands of marijuana). If I need him (Amer Jabir), I'm thirsty, I'll fuck with him (conduct narcotics trafficking with Amer Jabir). But, I'm showing that niggers don't need him. He (Amer Jabir) thinks he owns me and he don't. He thinks he owns a nigger when he got a tab (when you have a drug debt). You know what I'm saying? Like yo, you got my bread? And he'll (Amer Jabir) say shit in front of niggers -- try to own you and shit, man, and, by God, he got me salty. Like, yesterday he (Amer Jabir) came to the store (Gas and Go) talking mad shit. Oh, you got all my money. Like, yeah nigger it's in my back pocket right now. I got thirty-eight racks (\$38,000) in my back pocket right now. You know what I'm saying, like nigger, what the fuck. I'm at work, why can't you ask differently? You know what I'm saying? Every time it's the same shit. He (Amer Jabir) don't say what up, he don't ... niggers up. For all he says that comes out of his mouth, you got my money.

Affiant believes the wire interception above reveals that Ahmad Jabir and Abdelrahim engage in narcotics transactions together; that Abdelrahim has sold Co-Conspirator 5 marijuana which Abdelrahim obtained from Amer Jabir; that Abdelrahim recently obtained Amer Jabir's drug debt payment from Co-Conspirator 4 and provided it to Co-Conspirator 2; and that Abdelrahim

paid Amer Jabir “his money” for narcotics previously received on the night of September 20, 2017.

28. On October 5, 2017 at 10:42 p.m., MAJA VRACAR, utilizing 216-XXX-4120,¹¹ placed a call to Aymen Abdelrahim, using **Target Telephone 1**, in reference to VRACAR transporting narcotics or money from Abdelrahim to their apartment and in reference to police presence near the apartment. Listed below is a partial transcript of the call:

AA: I got to go to North Olmsted, I was going to come, run to the house, drop something off (drugs or money), if you could meet me downstairs (to pick up narcotics/money), like where Blue (their dog) poops.

MV: Huh?

AA: I will pull up. If you could me meet me outside where Blue poops.

MV: Uh huh... Just so you know, where Blue poops, all day they got the Boys (Cleveland Police) posted on every corner, like two of them

AA: You say what?

MV: I said, the boys are posted on the corner, literally across from our residence. The boys, boys (Police) with a car, they have been directing traffic all day. There are two of them. There are two cars. (On October 5, 2017, the Cleveland Indians played the New York Yankees in the American League Division Series at Jacob’s Field. Affiant believes that VRACAR was referring to Cleveland Police Officers directing traffic as a result of the playoff game.)

AA: Yeah, like you said, they are directing traffic. They ain’t gonna be.

MV: Well, not yet. Not yet. They were earlier when it was hectic. Right now it is not hectic.

AA: Alright, that is cool, I am gonna just go straight there then. I am gonna go straight there then come home.

MV: You can come here, but I would rather you pull up in front of the building. Do you want to just drop something off to me?... Make sure you don’t swerve, pay attention, a lot of people have been drinking and the boys (Police) know that...Talk to me when you leave work, and get there, and are on your way home so I know.

¹¹ Intercepts over **Target Telephone 1** identified VRACAR as the user of this telephone. Furthermore, Affiant spoke with VRACAR on this telephone number on January 23, 2018 as set forth in paragraph 41.

Affiant believes that the investigation conducted to date including numerous instances of physical surveillance conducted from August 2017 through January 2018, this wire interception and other wire interceptions over **Target Telephone 1**, and a January 23, 2018 federal search warrant executed at the Residences at Hanna, 1401 Prospect Avenue, Apartment 803, Cleveland, Ohio identified that Abdelrahim and VRACAR resided together at Apartment 803 from at least September 2017 through January 23, 2018¹². Affiant believes in the call above that Abdelrahim is informing VRACAR that he is coming home to drop off narcotics or money, that VRACAR then warns Abdelrahim about Cleveland Police presence in the area as a result of a Cleveland Indians playoff game, and that VRACAR also offered to assist Abdelrahim by meeting him downstairs. Affiant further believes the call above identifies VRACAR's involvement in the Target Offenses.

29. On October 6, 2017 at 1:01 p.m., Unknown Male (UM) UM5143, utilizing 216-XXX-5143,¹³ placed a call to Aymen Abdelrahim, using **Target Telephone 1**, in reference to meeting to conduct narcotics trafficking. Listed below is a transcript of the call.

UM5143: You gonna be at the crib for a minute?
AA: Yea, I'm gonna before I have to go to work.
UM5143: Can I pull up on you real quick? (Can I come meet you to purchase narcotics?)
AA: Yea.
UM5143: So I can buy shit. (So, I can purchase narcotics.)
AA: Yea.
UM5143: Alright bye. (IA)

12 On January 22 and January 23, 2018, the Honorable United States Magistrate Judge David A. Ruiz, NDOH, signed search warrants authorizing the seizure of evidence in relation to the Target Offenses from 1401 Prospect Avenue, Apartment 803, Cleveland, Ohio.

13 The subscriber of 216-XXX-5143 is known to Affiant. However, agents have not yet identified if the subscriber is fact the user of this telephone. Therefore, the individual using this phone will be referred to as UM5143.

AA: How long you need? (When will you be here?)
UM5143: I'll be there in probably like, what, twenty, fifteen minutes?
AA: Alright.

Affiant believes, based upon this conversation and follow-up calls, that UM5143 and Abdelrahim were arranging to meet in order to conduct narcotics trafficking and that Abdelrahim supplies UM5143. It is further believed that UM5143 and Abdelrahim are discussing meeting near MAJA VRACAR and Abdelrahim's apartment. Affiant believes that the controlled purchase described in paragraph 25, subsequent wire intercepts over **Target Telephone 1** described herein and additional wire intercepts over **Target Telephone 1**, and a search warrant executed at 1401 Prospect Avenue, Apartment 803, Cleveland, Ohio on January 23, 2018, have identified Abdelrahim and VRACAR's apartment was utilized by Abdelrahim and VRACAR as a location to store and distribute narcotics and narcotics trafficking proceeds. Affiant believes that previous and subsequent wire interceptions over **Target Telephone 1** have identified that Abdelrahim supplies UM5143 with narcotics, likely marijuana, on a regular and frequent basis.

30. On October 13, 2017 at 6:21 p.m., Unknown Male 6065 (UM6065), utilizing 216-XXX-6065, placed a call to Aymen Abdelrahim, using **Target Telephone 1**, in reference to a purchasing marijuana. Listed below is a partial transcript of the call:

AA: Yo
UM6065: What up Heime?
AA: What up baby?
UM6065: Shit, what's good?
AA: I'm at the shop (at the Gas and Go).
UM6065: You at the shop?
AA: Ya.
UM6065: What's up? How is the Khodrah [Arabic for green vegetables] is looking? (Do you have any marijuana?)
AA: Ya, ya, after work. (Abdelrahim will have the marijuana after work)

UM: Alright?
 AA: Alright, I will call you when I get that way.

Affiant believes in the call above that UM6065 is asking Abdelrahim about obtaining marijuana and that Abdelrahim informs UM6065 that he will have the marijuana after work. Surveillance, information provided by CS-1 and CS-2, and wire interceptions over **Target Telephone 1** have identified that Abdelrahim worked at the Gas and Go, usually from 3 p.m. until 11 p.m. on weekdays.

31. On October 13, 2017, from 7:35 p.m. until 7:41 p.m., Aymen Abdelrahim, using **Target Telephone 1**, sent text messages to UM5143, using 216-XXX-5143, and UM6065, using 216-XXX-6065, in reference to purchasing narcotics at the Gas and Go. As set forth in paragraph 29, Affiant believes that wire interceptions over **Target Telephone 1** have identified that Abdelrahim supplies UM5143 with narcotics, likely marijuana, on a regular and frequent basis. Listed below are the text messages

7:35 P.M. AA to UM5143:	9 clock (Abdelrahim will have drugs ready for sale at the Gas and Go at 9 o'clock. It should be noted that at approximately 4:16 p.m., on October 13, 2017, UM5143 and Abdelrahim were intercepted during a telephone call over <u>Target Telephone 1</u> during which UM5143 told Abdelrahim that he was going to stop by. Thereafter, at 5:41 p.m. on October 13, 2017, Abdelrahim texted UM5143, "I'll text u when to come change plans.")
7:41 P.M. AA to UM6065	Going have that dropped off at 9 if u can slide up here

	(Abdelrahim will have the marijuana discussed in paragraph 31 delivered to the Gas and Go at 9 p.m.)
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32. On October 13, 2017 at 8:16 p.m., MAJA VRACAR, utilizing 216-XXX-4120, placed a call to Aymen Abdelrahim, using **Target Telephone 1**, in reference to VRACAR delivering a quantity of narcotics to Abdelrahim's car, at the Gas and Go. Listed below is a partial transcript of the call:

AA: Hello
MV: I am about to be there in a minute. Where do you want me ... to put the ... (Where do you want me to put the drugs?)
AA: Um. Put it (the drugs) in the middle compartment.
MV: Okay.
AA: Do you see West 25th, right after the light. Say you are facing towards Clark. You already pulled in or no?
MV: No, I am getting off 25th now, but why are you telling me this?
AA: Okay, do me a favor. Make a left on the light and then turn into the parking lot. Tell me if you see a cop car like right after the light.
MV: On the street.
AA: Yeah
MV: Like hiding? OK, I got you! I will make a wrap around, real quick
AA: Alright
MV: Alright, baby!

Affiant believes in the call above that VRACAR asked Abdelrahim where he wants VRACAR to stash drugs (likely marijuana based upon the intercepted calls and texts described above with UM5143 and UM6065) in his vehicle. Affiant further believes that Abdelrahim is asking VRACAR to check and report to him regarding police activity in the area. Affiant believes in the call above by VRACAR was in furtherance of the Target Offenses.

33. On October 13, 2017, from 8:20 p.m. until 8:43 p.m., Aymen Abdelrahim, using

Target Telephone 1, exchanged several text messages with MAJA VRACAR, using 216-XXX-4120, and with UM6065, using 216-XXX-6065, in reference to the delivery and sale of a quantity of narcotics to his place of employment, the Gas and Go. Listed below are the text messages

8:20 P.M. MV to AA:	unlock car (VRACAR needs Abdelrahim to unlock his car at the Gas and Go so that VRACAR can place a quantity of narcotics in his vehicle.)
8:33 P.M. MV to AA	you good! (The narcotics have been delivered)
8:37 P.M. AA to UM6065:	Come snatch that before 11 plz (Come and obtain the previously discussed narcotics before 11 p.m.)
8:43 P.M. UM6065 to AA:	Ok
8:43 P.M. AA to UM6065:	Bet (You bet!)

Affiant believes based upon the texts exchanged above that VRACAR did in fact deliver a quantity of narcotics to Abdelrahim in violation of the Target Offenses and the texts above were in furtherance of the Target Offenses. A review of historical cell site information¹⁴ for **Target Telephone 1**, being used by Abdelrahim, identifies that it was accessing a cellular tower approximately 675 yards north of the Gas and Go during the October 13, 2017 calls/texts described in paragraphs 30 through 33. Affiant believes this further confirms that Abdelrahim was located at the Gas and Go at the times these calls/texts were placed/received.

¹⁴ On February 16, 2018, the Honorable U.S. Magistrate Judge David A. Ruiz, NDOH, signed an order commanding the service provider for **Target Telephone 1** to produce all data about which "cell towers" received a radio signal from **Target Telephone 1**.

34. On October 14, 2017 at 1:36 p.m., MAJA VRACAR, utilizing 216-XXX-4120, placed a call to Aymen Abdelrahim, using **Target Telephone 1**, in reference to VRACAR creating a sample of marijuana for Abdelrahim. Listed below is a partial transcript of the call:

AA:	Hello
MV:	Hey
AA:	Hey
MV:	What's in the big bag or what's loose?
AA:	What's loose.
MV:	Ok, got you.
AA:	Take out the good looking ones (take out the best quality marijuana) cause I want to show it to somebody.
MV:	Ok
AA:	Nothing with stems on it.
MV:	Got it (talking over each other)
AA:	just (UI) nuggs (Abdelrahim wishes to provide his potential customer with the marijuana buds). It don't even have to be a 3.5 (three point five grans, or 1/8 of an ounce, a common quantity in which drugs are sold) like you can can make it 2, 2Gs (two grams)..just a sample
MV:	Oh, ok. alright
AA:	Alright
MV:	Alright, bye.
AA:	Bye.

A review of historical cell site information for **Target Telephone 1**, being used by Abdelrahim, identifies that it was accessing a cellular tower approximately 675 yards north of the Gas and Go during the Saturday, October 14, 2017 call described herein. Affiant believes this indicates that Abdelrahim was located at the Gas and Go at the time this calls was received. Affiant believes in the call above that VRACAR is assisting Abdelrahim in his marijuana trafficking activities by preparing a two gram marijuana sample for Abdelrahim to show his customers in violation of the Target Offenses.

35. On October 18, 2017, from 6:22 p.m. until 8:27 p.m., Aymen Abdelrahim, using

Target Telephone 1, exchanged several text messages with UM5143, using 216-XXX-5143, and MAJA VRACAR, using 216-XXX-4120, in reference to the delivery and sale of a quantity of narcotics to his place of employment, the Gas and Go. Listed below are the text messages

6:22 P.M. AA to UM5143:	Had to let it go. Going to have one dropped off soon. Ill text u when it's here (Abdelrahim sold drugs he had previously promised UM5143. Abdelrahim promised to have an additional quantity of drugs delivered. Due to the quantity, "one," Affiant believes that UM5143 was purchasing marijuana.)
6:23 P.M. UM5143 to AA	O man how long
6:23 P.M. AA to UM5143:	Bout figure it out. My girl (MAJA VRACAR) shopping as soon as she gets home
6:24 P.M. AA to MV:	U think u can run home for me when u get a chance? (Can you obtain drugs from me from our apartment and deliver them to my work?)
7:04 P.M. AA to UM5143:	My brother here can't take call. But she bout be on way crib snatch that. Im call u soon as I'm good. (Abelrahim cannot discuss narcotics trafficking around his brother. Abdelrahim told UM5143 that VRACAR is on her way to their apartment to grab the narcotics and that Abdelrahim will call UM5143 as soon as it arrives.)

7:04 P.M. UM5143 to AA	ok
7:34 P.M. AA to MV:	U think u can run home for me when u get a chance? (Can you obtain drugs from me from our apartment and deliver them to my work?)
7:55 P.M. AA to MV:	Nore here? (Abdelrahim is warning VRACAR that his brother is at the Gas and Go.)
7:55 P.M. MV to AA:	Snap me what you need (Contact me over Snapchat and advise me of the type and amount of narcotics you need delivered to the Gas and Go. The interceptions over <u>Target Telephone 1</u> did not result in the interception of Snapchat conversations.)
8:11 P.M. AA to UM5143:	30 min be here (the drugs will be here in 30 minutes)
8:27 P.M. MV to AA:	Is he still there (Is your brother still present?)
8:27 P.M. AA to MV:	No u good (you can deliver the quantity of narcotics)

Affiant believes the texts above sent and received by VRACAR were in furtherance of the Target Offenses.

36. On October 18, 2017 at 8:33 p.m., MAJA VRACAR, utilizing 216-XXX-4120, placed a call to Aymen Abdelrahim, using **Target Telephone 1**, in reference to VRACAR delivering a quantity of narcotics to Abdelrahim's car at the Gas and Go. Listed below is a partial transcript of the call:

AA: Hello

MV: Where do you want this stuff? (Where in the car should I put the drugs?)
 AA: Huh
 MV: Where do you want this stuff?
 AA: Put the, put the
 MV: the bb (a type or size of a quantity of drugs)
 AA: Put the bb on the passenger side of the floor under the bookbag.
 MV: Passenger side of the floor under the bookbag alright.
 AA: And the other one in the middle console.
 MV: Got it. Be ready to unlock.
 AA: It's unlocked.

Affiant believes in the call above that VRACAR, Abdelrahim's girlfriend and roommate, and Abdelrahim, are discussing where to place the drugs in Abdelrahim's car which was located at the Gas and Go. Affiant believes based upon the texts above, the text in the next paragraph, and the phone call above, that VRACAR delivered a quantity of narcotics to ABDELRAHIM at the Gas and Go and that the phone calls and texts by VRACAR were in violation of the Target Offenses.

37. On October 18, 2017, at 8:52 p.m., Aymen Abdelrahim, using **Target Telephone 1**, sent a text messages to UM5143, using 216-XXX-5143, confirming he had received the narcotics Abdelrahim promised to sell UM5143 at the Gas and Go. Listed below is the text message:

8:52 P.M. AA to UM5143:	Ready (Abdelrahim now has the drugs available to sell to UM5143.)
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A review of historical cell site information for **Target Telephone 1**, being used by Abdelrahim, identifies that it was accessing a cellular tower approximately 675 yards north of the Gas and Go during the October 18, 2017 calls/texts described in paragraphs 35 through 37. Affiant believes

this further confirms that Abdelrahim was located at the Gas and Go at the times these calls/texts were placed/received.

38. On January 22, 2018, at approximately 4:06 p.m., the Honorable United States Magistrate Judge David A. Ruiz, NDOH, signed a search and seizure warrant (1:18-mj-2011), authorizing the seizure of United States Currency and other items of value which were proceeds of drug trafficking, evidence of financial transactions related to money acquired from drug trafficking, financial records, ledgers noting the times, places, prices, and or quantity of drugs bought or sold, cellular telephones and other records containing names, addresses and telephone numbers for associates in the drug trafficking organization, documents in reference to travel arrangements, and photographs from the residence of Aymen Abdelrahim, 1401 Prospect Avenue, Apartment 803, Cleveland, Ohio.

39. During the execution of the search warrant on the morning of January 23, 2018, at approximately 9:15 a.m., agents located a black duffle bag in the master bedroom closet containing what appeared to be approximately two pounds of marijuana. Also, approximately one pound of marijuana was located in a linen closet in the bathroom adjoining the master bedroom. As a result, agents stopped searching the premises and submitted an application and affidavit in support of a search warrant at 1401 Prospect Avenue, Apartment 803, Cleveland, Ohio, seeking the seizure of cashes of drugs, drug paraphernalia, drug packaging materials, as well as the seizure of United States Currency and other items of value which were proceeds of drug trafficking, evidence of financial transactions related to money acquired from drug trafficking, financial records, ledgers noting the times, places, prices, and or quantity of drugs bought or sold, cellular telephones and other records containing names, addresses and telephone

numbers for associates in the drug trafficking organization, documents in reference to travel arrangements, and photographs. On January 23, 2018, at approximately 10:50 a.m., the Honorable United States Magistrate Judge David A. Ruiz, NDOH, signed a search and seizure warrant (1:18-mj-2013), authorizing the seizure of the items set forth above in this paragraph.

40. During the execution of the search warrant on the morning/early afternoon of January 23, 2018, agents located the drug items listed above, baggies, a scale, a box containing a heat seal roll, \$19,043 in cash, and six cellular telephones. Aymen Abdelrahim was also arrested at this residence and MAJA VRACAR was located at the residence. VRACAR departed the scene shortly after agent's arrival. Affiant also identified photograph of VRACAR on the refrigerator in the residence. VRACAR was also served with a "target letter" at the residence. The suspected marijuana seized pursuant to the search warrant was tested by the Ohio Bureau of Criminal Investigations Laboratory and found to be marijuana.

41. At the completion of the search warrant, on the morning/early afternoon of January 23, 2018, Affiant called MAJA VRACAR on her known cellular telephone number 216-XXX-4120 and informed her that agents had completed the search and departed her residence. Affiant and VRACAR further discussed the target letter and Affiant informed VRACAR that he hoped to speak with her in the future. Affiant recognized the voice of VRACAR to be the same voice overheard on the interceptions of **Target Telephone 1**.

42. On March 15, 2018, Affiant contacted MAJA VRACAR at her residence, 3330 Norris Avenue, Parma, Ohio. During the encounter, VRACAR advised that she had retained an attorney. Affiant identified the individual he encountered matched in appearance VRACAR's driver's license photograph and the previous pictures located on the refrigerator at VRACAR and

Aymen Abdelrahim's apartment, 1401 Prospect Avenue East, Apartment 803, Cleveland, Ohio. Affiant recognized the voice of VRACAR to be the same voice overheard on the interceptions of **Target Telephone 1** and the voice overheard on the January 23, 2018 telephone conversation.

43. On April 25, 2018, the Honorable U.S. Magistrate Judge David A. Ruiz, NDOH, authorized a search warrant for a Samsung cellular telephone seized from 1401 Prospect Avenue, Apartment 803, Cleveland, Ohio on January 23, 2018. A subsequent search identified July 2017 text messages between Aymen Abdelrahim and UM5143 during which Abdelrahim informed UM5143 that his "girl" (VRACAR) would bring "it" in a couple of hours. Based upon the foregoing, Affiant believes that VRACAR has been involved in the Target Offenses since July 2017.

AUTHORIZATION REQUEST

44. Based on the facts and circumstances noted above, it is the opinion of Affiant that from July 2017 to the January 23, 2018, in the NDOH, MAJA VRACAR, and others, possessed with intent to distribute marijuana and conspired to distribute marijuana in violation of Title 21 U.S.C., Sections 841 and 846, and unlawfully used a communication facility in violation of Title 21, U.S.C., Section 843. Affiant hereby requests the issuance of an arrest warrant for MAJA VRACAR.

— *David Gardner* —
David Gardner, Special Agent, F.B.I.

This affidavit was sworn to by the affiant, who did no more than attest to its contents pursuant to Crim. R. 4.1(b)(2)(A), by telephone after a PDF was transmitted by email, per Crim R. 4.1.

David A. Ruiz
DAVID A. RUIZ
U.S. MAGISTRATE JUDGE



June 22, 2018
Date

3:47pm
Time